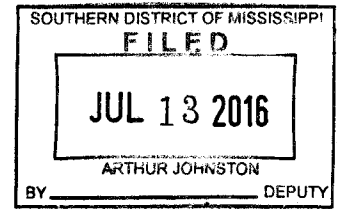


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:16-cr-50-HTW-FKB

CARL REDDIX

18 USC § 1349

18 USC § 666(a)(2)

The Grand Jury charges:

At all times relevant to this indictment:

1. The Mississippi Department of Corrections (MDOC) was a state government agency as that term is defined in Section 666(d), Title 18, United States Code, and which received benefits in excess of \$10,000 annually between 2007 and 2014 under Federal programs providing Federal assistance to MDOC.

2. CHRISTOPHER B. EPPS was the commissioner of the MDOC.

3. The defendant, **CARL REDDIX**, was one of the owners of Health Assurance, LLC.

4. Health Assurance, LLC was under contract with the State of Mississippi to provide healthcare services to inmates at MDOC facilities.

5. Health Assurance, LLC obtained a contract from the MDOC to provide inmate health care services at Walnut Grove Correctional Facility in 2008. This contract was renewed in 2011.

6. Health Assurance, LLC obtained contracts from the MDOC to provide inmate health care services at East Mississippi Correctional Facility and Marshall County Correctional Facility in 2012.

7. Health Assurance, LLC obtained a contract to provide inmate health care services at Wilkinson County Correctional Facility in 2013.

COUNT 1

8. The allegations contained in paragraphs one through seven of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

9. From in or about 2012, and continuing until at least October 1, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **CARL REDDIX**, did knowingly and intentionally combine, conspire, confederate, and agree with CHRISTOPHER B. EPPS, to commit one or more of the following offenses: to devise and intend to devise a scheme and artifice to defraud the Mississippi Department of Corrections and the State of Mississippi and its citizens of their intangible right to CHRISTOPHER B. EPPS's honest services, through bribes and kickbacks, by use of interstate wire transmissions, in violation of Sections 1343 and 1346, Title 18, United States Code.

10. It was the object of the conspiracy that defendant **CARL REDDIX** would bribe or provide kickbacks to CHRISTOPHER B. EPPS, in exchange for the awarding and the retention of contracts to HEALTH ASSURANCE, LLC for inmate health care services at MDOC facilities;

11. In furtherance of the conspiracy and to carry out its objectives, the following acts, among others, were committed:

12. Beginning in 2012, the defendant, **CARL REDDIX**, began regularly providing CHRISTOPHER B. EPPS with cash payments in the amount of \$6,000.00 per month, in exchange for CHRISTOPHER B. EPPS using his influence as commissioner of MDOC to

benefit REDDIX and his company, Health Assurance, LLC financially.

13. Beginning in 2013, with the addition of the contract to provide inmate health services to the Wilkinson County Correctional Facility, the defendant, **CARL REDDIX**, increased his cash payments by an additional \$2,000.00 per month and began regularly providing CHRISTOPHER B. EPPS with cash payments in the amount of \$8,000.00 per month, in exchange for CHRISTOPHER B. EPPS using his influence as commissioner of MDOC to benefit REDDIX and his company, Health Assurance, LLC financially.

14. On or about each of the following dates of August 1, 2014, and September 2, 2014, the defendant, **CARL REDDIX**, paid cash to CHRISTOPHER B. EPPS in the amount of \$9,000.00.

15. On or about October 1, 2014, the defendant, **CARL REDDIX**, paid cash to CHRISTOPHER B. EPPS in the amount of \$9,500.00.

All in violation of Sections 1349 and 2, Title 18, United States Code.

COUNT 2

16. The allegations contained in paragraphs one through fifteen of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

17. On or about May 1, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **CARL REDDIX**, did knowingly and corruptly give, offer, and agree to give something of value, that is, \$8,000.00 in cash, to CHRISTOPHER B. EPPS, with intent to influence and reward CHRISTOPHER B. EPPS in connection with the business, transaction, and series of transactions of the Mississippi Department of Corrections, involving something of value of \$5,000.00 or more, that is, the awarding and the retention of contracts to Health Assurance, LLC for inmate health care services

at MDOC facilities.

All in violation of Sections 666(a)(2), and 2 Title 18, United States Code.

COUNT 3

18. The allegations contained in paragraphs one through seventeen of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

19. On or about June 1, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **CARL REDDIX**, did knowingly and corruptly give, offer, and agree to give something of value, that is, \$8,000.00 in cash, to CHRISTOPHER B. EPPS, with intent to influence and reward CHRISTOPHER B. EPPS in connection with the business, transaction, and series of transactions of the Mississippi Department of Corrections, involving something of value of \$5,000.00 or more, that is, the awarding and the retention of contracts to Health Assurance, LLC for inmate health care services at MDOC facilities.

All in violation of Sections 666(a)(2), and 2 Title 18, United States Code.

COUNT 4

20. The allegations contained in paragraphs one through nineteen of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

21. On or about July 1, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **CARL REDDIX**, did knowingly and corruptly give, offer, and agree to give something of value, that is, \$8,500.00 in cash, to CHRISTOPHER B. EPPS, with intent to influence and reward CHRISTOPHER B. EPPS in connection with the business, transaction, and series of transactions of the Mississippi

Department of Corrections, involving something of value of \$5,000.00 or more, that is, the awarding and the retention of contracts to Health Assurance, LLC for inmate health care services at MDOC facilities.

All in violation of Sections 666(a)(2), and 2 Title 18, United States Code.

COUNT 5

22. The allegations contained in paragraphs one through twenty-one of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

23. On or about August 1, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **CARL REDDIX**, did knowingly and corruptly give, offer, and agree to give something of value, that is, \$9,000.00 in cash, to CHRISTOPHER B. EPPS, with intent to influence and reward CHRISTOPHER B. EPPS in connection with the business, transaction, and series of transactions of the Mississippi Department of Corrections, involving something of value of \$5,000.00 or more, that is, the awarding and the retention of contracts to Health Assurance, LLC for inmate health care services at MDOC facilities.

All in violation of Sections 666(a)(2), and 2 Title 18, United States Code.

COUNT 6

24. The allegations contained in paragraphs one through twenty-three of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

25. On or about September 2, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **CARL REDDIX**, did knowingly and corruptly give, offer, and agree to give something of value, that is, \$9,000.00 in cash, to CHRISTOPHER B. EPPS, with intent to influence and reward CHRISTOPHER B. EPPS in

connection with the business, transaction, and series of transactions of the Mississippi Department of Corrections, involving something of value of \$5,000.00 or more, that is, the awarding and the retention of contracts to Health Assurance, LLC for inmate health care services at MDOC facilities.

All in violation of Sections 666(a)(2), and 2 Title 18, United States Code.

COUNT 7

26. The allegations contained in paragraphs one through twenty-five of this indictment are realleged and incorporated herein by reference as though fully set forth herein.

27. On or about October 1, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **CARL REDDIX**, did knowingly and corruptly give, offer, and agree to give something of value, that is, \$9,500.00 in cash, to CHRISTOPHER B. EPPS, with intent to influence and reward CHRISTOPHER B. EPPS in connection with the business, transaction, and series of transactions of the Mississippi Department of Corrections, involving something of value of \$5,000.00 or more, that is, the awarding and the retention of contracts to Health Assurance, LLC for inmate health care services at MDOC facilities.


All in violation of Sections 666(a)(2), and 2 Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offense, and all property used to facilitate the offense. Further, if any property described above, as a result

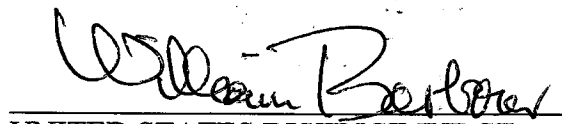
of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(A) & (C), Title 18, United States Code and Section 2461, Title 28, United States Code.


HAROLD BRITTAIN
Acting United States Attorney

A TRUE BILL:
S/SIGNATURE REDACTED
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 13 day of July, 2016.


UNITED STATES DISTRICT JUDGE